

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

Blockquarry Corp. f/k/a ISW Holdings, Inc.,)

Civil Action No. 7:23-cv-01427-TMC

Plaintiff and Third-Party)
Defendant,)

vs.)

Litchain Corp. and Gaffney Board of Public Works,)

Defendants.)

BITMAIN’S MOTION TO INTERVENE

Gaffney Board of Public Works,)

Defendant and Counter-)
/Cross-Claimant)

vs.)

Blockquarry Corp. f/k/a ISW Holdings, Inc.,)
Counterclaim-Defendant,)

Counterclaim-Defendant)

and)

Litchain Corp.)

Crossclaim-Defendant)

Pursuant to Fed. R. Civ. P. 24, Bitmain Technologies Georgia Limited (“Bitmain”) moves the Court to allow Bitmain to intervene in this litigation to seek: (1) an order to maintain the status quo in order to protect and preserve the safety of Bitmain’s 4,513 bitcoin mining servers (the “Mining Servers”) previously located at a data center owned by the Gaffney Board of Public Works (“Gaffney BPW”) until Bitmain obtains appropriate relief in a pending arbitration proceeding brought against Blockquarry Corp. f/k/a ISW Holdings, Inc. (“Blockquarry”); (2) a

determination that Blockquarry and/or Gaffney BPW violated the Court's April 12, 2023 Order prohibiting the parties from exposing the Mining Servers to spoliation, waste, or dissipation and granting appropriate relief; and (3) an order enforcing the settlement agreement between Gaffney BPW and Blockquarry.

Pursuant to Local Rule 7.02, Bitmain certifies that it has contacted counsel for Blockquarry and Gaffney BPW seeking their consent to this motion. Gaffney BPW does not consent. As of the filing of this Motion, counsel for Blockquarry has not responded. Due to the urgency of the situation and Blockquarry's pattern of delay, Bitmain files this motion now.

WHEREFORE, Bitmain respectfully requests that this Court allow Bitmain to intervene in this litigation to file the complaint attached hereto as Exhibit A and to seek other relief as discussed above.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s/Paul Collins
Paul Collins
Federal Bar No. 9055
paul.collins@nelsonmullins.com
1320 Main Street, 17th Floor
Columbia, SC 29201
803.255.9747

Attorneys for Plaintiff Bitmain Technologies Georgia Limited

Columbia, South Carolina

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